

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GIL C. VALDENACAS,)	
)	
Plaintiff,)	No.
)	
v.)	Formerly Case No. 21 L 291
)	Circuit Court of Lake County, Illinois
SHAWN OBRIAN TAYLOR,)	
)	
Defendant.)	

**NOTICE OF REMOVAL OF A CIVIL ACTION AND
SUBSTITUTION OF THE UNITED STATES AS DEFENDANT**

To:	Erin Cartwright Weinstein	George W. Svoboda
	Clerk of the Circuit Court of Lake County	37063 N. Kimberwick Lane
	18 N. County St.	Wadsworth, Illinois 60083
	Waukegan, Illinois 60085	

The United States, by its attorney, John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, submits this notice of removal of the above-captioned civil action from the Circuit Court of Lake County, Illinois, to the United States District Court, Northern District of Illinois, pursuant to the Federal Tort Claims Act, 28 U.S.C. § 2679, and in support thereof states the following:

1. On April 16, 2021, plaintiff commenced the above two-count civil action against his supervisor at the Lovell Federal Health Center in the Circuit Court of Lake County Illinois, alleging malicious prosecution and intentional infliction of emotional distress. Copies of all process, pleadings and orders served upon the defendant are attached pursuant to 28 U.S.C. § 1446(a) as Exhibit A.

2. This notice of removal is filed in accordance with 28 U.S.C. § 2679(d)(2) upon certification by the designee of the Attorney General of the United States that defendant Shawn

Taylor was acting within the scope of his federal employment at the time of the incident(s) alleged in the complaint. Exhibit B.

3. This notice of removal may be filed without bond at any time before trial. 28 U.S.C. § 2679(d)(2). Trial has not yet been had in this action.

4. Pursuant to the certification by the Attorney General's designee and the filing of this notice of removal, under 28 U.S.C. § 2679, this civil action is deemed an action against the United States, and the United States is substituted as the sole federal party defendant in place of defendant Shawn Taylor.

WHEREFORE, this action now pending in the Circuit Court of Lake County, Illinois, is properly removed to this court pursuant to 28 U.S.C. § 2679(d) and the United States is substituted as the defendant in lieu of Shawn O. Taylor.

Respectfully submitted,

JOHN R. LAUSCH, Jr.
United States Attorney

By: s/ Thomas Walsh

THOMAS P. WALSH
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-5312
thomas.walsh2@usdoj.gov

Exhibit A

FILED**4/16/2021 8:48 AM****IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS, LAW DIVISION****ERIN CARTWRIGHT WEINSTEIN
Clerk of the Circuit Court
Lake County, Illinois**

Gil C. Valdecanas

Plaintiff,

VS.

Shawn Obrian Taylor

Defendant.

21L 00000291

Gen No. _____

JURY TRIAL DEMANDED**COMPLAINT**

NOW COMES the Plaintiff, Gil C. Valdecanas, by its attorney, The Law Office of George W. Svoboda, and bring this complaint against Defendant for malicious prosecution and intentional infliction of emotional distress. In support of this Complaint, Plaintiff states as follows:

PARTIES

1. Plaintiff, Gil C. Valdecanas (hereinafter referred to as "Mr. Valdecanas"), is a citizen of the State of Illinois who resides at 2020 Devonshire Road, Waukegan, Illinois 60087 and is an employee of the Captain James A. Lovell Federal Health Care Center in North Chicago, Illinois.

2. Plaintiff is informed and believes, and thereon alleges, that Defendant, Shawn Obrian Taylor (hereinafter referred to as "Mr. Taylor"), is a citizen of the state of Illinois who resides at 1417 13th Street, Winthrop Harbor, Illinois 60096 and is an employee of the Captain James A. Lovell Federal Health Care Center in North Chicago, Illinois.

JURISDICTION AND VENUE

3. This Court has jurisdiction because the parties are citizens of the State of Illinois and both reside in Lake County, Illinois. Venue is proper in Lake County, Illinois pursuant to 735 ILCS 5/2-101, because the Defendant resides in Lake County, Illinois and the Plaintiff's prosecution and the events leading up to it all took place in Lake County, Illinois.

NOTICE**PURSUANT TO LCR - 2-2.14**

**THIS CASE IS HEREBY SET FOR AN INITIAL CASE MANAGEMENT CONFERENCE
IN COURTROOM _____ ON**

AT**A.M./P.M.**

**FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR
AN ORDER OF DEFAULT BEING ENTERED.**

ALLEGATIONS OF FACT

4. The Plaintiff and the Defendant are both employees of the Captain James A. Lovell Federal Health Care Center ("FHCC") in North Chicago, Illinois. Mr. Taylor is the supervisor of Mr. Valdecanas.

5. On or about June 16, 2014, Mr. Valdecanas was elected to the position of Sgt-at-arms for the American Federation of Government Employees (AFGE) union, local 2107 and was designated as union steward and the safety officer.

6. Over the course of the following years, Mr. Valdecanas, in his position of safety officer, reported numerous safety issues in Mr. Taylor's operation.

7. In his position as union steward, Mr. Valdecanas attended multiple ceremonies and events for FHCC during work hours, which necessitated other employees in Mr. Taylor's operation to cover Mr. Valdecanas' duties.

8. On or about July 2016, Mr. Valdecanas was injured while at work and called out sick the following day, to which Mr. Taylor charged Mr. Valdecanas with being absent without leave (AWOL). A union grievance was filed by the union on Mr. Valdecanas' behalf for the AWOL charge.

9. On or about April 21, 2017, the union filed a grievance against Mr. Taylor for unfair overtime scheduling practices.

10. Over the course of the years 2016 and 2017, Mr. Taylor began harassing Mr. Valdecanas for the numerous safety complaints, management escalations and union grievances.

11. On or about January 29, 2018, the President of AFGE Local 2107 sent an email message to the Assistant Department Head in charge of Mr. Taylor's department expressing concerns about Mr. Taylor's harassment of Mr. Valdecanas and general union animus.

12. In February 2018, Mr. Taylor asked employees in his department to announce over their walkie-talkies when Mr. Valdecanas left the department and returned from official union duties. This escalated the animosity in the department between other employees and Mr. Valdecanas.

13. On December 12, 2019, an argument ensued during a department meeting between Mr. Valdecanas and another employee. Mr. Valdecanas approached the other employee, Mr. Arthur Lopez, and Mr. Taylor stepped in between them.

14. Another employee, Mr. Jerry Montgomery, grabbed Mr. Valdecanas at this time, and restrained him by wrapping his arms around Mr. Valdecanas, pinning one of his arms to his side.

15. Mr. Taylor had his back to Mr. Valdecanas, and Mr. Taylor is taller and larger than Mr. Lopez, so neither Mr. Taylor nor Mr. Lopez could see Mr. Valdecanas at the time.

16. After the argument on December 12, 2019, Mr. Taylor falsely accused Mr. Valdecanas of pushing him from behind with both hands, into Mr. Lopez.

17. Mr. Valdecanas did not push Mr. Taylor. Further, Mr. Valdecanas could not have pushed Mr. Taylor with both hands while Mr. Montgomery was pinning one of his hands to his side. No injuries were reported.

18. Mr. Taylor subsequently contacted the FHCC police about Mr. Valdecanas and pursued a charge of battery against him.

19. Mr. Taylor asked the other employees that were present to document that Mr. Valdecanas pushed Mr. Taylor.

20. On or about December 20, 2019, Mr. Valdecanas was charged with a Class A Misdemeanor of Battery and subsequently prosecuted by the State of Illinois State's Attorney.

21. On or about January 2, 2020, due to Mr. Taylor's prosecution of Mr. Valdecanas, the Assistant Department Head restricted Mr. Valdecanas' access to Mr. Taylor's Mechanic's Shop department during breaks and lunches.

22. In February 2020, while Mr. Valdecanas was on leave, Mr. Taylor had Mr. Valdecanas' remote computer access revoked.

23. On or about July 28, 2020, Mr. Valdecanas returned to the Mechanic's Shop to retrieve his tools, and Mr. Taylor called the FHCC police, who arrived to question Mr. Valdecanas about his presence in the Mechanic's Shop causing Mr. Valdecanas to feel intimidated and threatened.

24. Mr. Valdecanas' battery case went to bench trial on November 6, 2020. Mr. Taylor and Mr. Lopez testified against Mr. Valdecanas. Mr. Montgomery did not testify. The Court found Mr. Valdecanas not guilty.

25. In his testimony at the trial on November 6, 2020, Mr. Taylor admitted that there was a lot of animosity in his department toward Mr. Valdecanas.

26. Mr. Valdecanas incurred \$4,282.28 in costs defending himself against the false charges of Mr. Taylor. A true and correct copy of the itemized costs is attached hereto as Exhibit "1" and incorporated herein by reference. A true and correct copy of the receipt for the court transcript for the battery case is attached hereto as Exhibit "2" and incorporated herein by reference.

27. The defendant's outrageous behavior caused Mr. Valdecanas to suffer severe emotional distress, including anxiety, fear, anger, depression and injury to his reputation.

COUNT I

28. Plaintiff repeats and realleges paragraphs 1 through 27 as if fully set forth herein.

29. Defendant Mr. Taylor initiated and continued a malicious prosecution against Mr. Valdecanas, without probable cause.

30. Defendant was instrumental in the initiation and perpetuation of the prosecution of Mr. Valdecanas for the crime of Class A Misdemeanor Battery.

31. Defendant Mr. Taylor acted with malice.

32. This prosecution was terminated in Mr. Valdecanas' favor on November 6, 2020, after the case against Mr. Valdecanas had been pending for more than 10 months.

33. Defendant Mr. Taylor is liable for this malicious prosecution because it was proximately caused by his unlawful actions as set forth above.

34. These actions directly and proximately caused the injuries and damages to plaintiff as claimed above, and constitute the tort of malicious prosecution under Illinois law.

WHEREFORE, Plaintiff prays for Judgment against Defendant as follows:

- For compensatory damages for actual costs incurred by the Plaintiff and for pain and suffering an amount in excess of Fifty Thousand dollars (\$50,000.00);
- For punitive damages in an amount sufficient to deter similar misconduct from the Defendant;
- For costs of suit incurred herein;
- For attorneys fees; and
- For whatever additional relief this Court deems just and equitable.

COUNT II

35. Plaintiff repeats and realleges paragraphs 1 through 27 as if fully set forth herein.

36. Defendant Mr. Taylor intentionally engaged in extreme and outrageous behavior against Mr. Valdecanas over several years, including, having him tracked by other employees, demeaning him in front of other employees, provoking and encouraging animosity between Mr. Valdecanas and other employees, calling the police to question him and restricting Mr. Valdecanas' movement at work.

37. Defendant Mr. Taylor is liable for this intentional infliction of emotional distress because it was proximately caused by his actions as set forth above.

38. The defendant's outrageous behavior caused Mr. Valdecanas to suffer severe emotional distress, including anxiety, fear, anger, depression and injury to his reputation.

WHEREFORE, Plaintiff prays for Judgment against Defendant as follows:

- For compensatory damages for actual costs incurred by the Plaintiff and for pain and suffering an amount in excess of Fifty Thousand dollars (\$50,000.00);

- For punitive damages in an amount sufficient to deter similar misconduct from the Defendant;
- For costs of suit incurred herein;
- For attorneys fees; and
- For whatever additional relief this Court deems just and equitable.

Respectfully submitted,

By: /s/ George W. Svoboda
Attorney for Plaintiff, Gil C. Valdecanas

George W. Svoboda #6220463
The Law Office of George W. Svoboda
37063 N Kimberwick Lane
Wadsworth, IL 60083
(224) 360-0696 – Phone
(413) 556-3884 – Fax
Email: george@georgesvobodalaw.com

VERIFICATION

Under the penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: April 11, 2021



Gil C. Valdecana

PLAINTIFF'S Address:

George W. Svoboda
The Law Office of George W. Svoboda
37063 N Kimberwick Lane
Wadsworth, IL 60083
Attorney for Plaintiff

Phone: (224) 360-0696 ARDC: 6220463

Email: george@georgesvobodalaaw.com

DEFENDANT'S Address:

Mr. Shawn Obrian Taylor
1417 13th Street
Winthrop Harbor, IL 60096

Phone: (847) 872-0471

Email: unknown

EXHIBIT '1'

12/27/19 Initial consultation
 Attorney fee \Rightarrow 25.00
 T/T House to Penitentiary 22 mi driving \Rightarrow 24.64
 44 mi @ 0.56/mi \Rightarrow 24.64] 2524.64

1/14/20 Legal Counsel \Rightarrow
 T/T 44 mi @ 0.56/mi \Rightarrow 24.64 \Rightarrow 24.64

1/27/20 Arraignment
 House to courthouse \Rightarrow 6.50
 5.8 mile x 2
 11.6 mi x 0.56/mi \Rightarrow 6.50] 8.50
 Parking \Rightarrow 2.-

Pre-Trial
 Parking \Rightarrow 2.-] 8.50
 T/T 11.6 mi x 0.56/mi \Rightarrow 6.50

Final hearing
 Parking \Rightarrow 10.-] 16.50
 T/T 11.6 mi x 0.56/mi \Rightarrow 6.50

12/7/20 Certified copy of disposition
 Parking - 3.-] 27.50
 T/T 11.6 x 0.56/mi \Rightarrow 6.50
 T/T \Rightarrow 1.8

12/15/20 Engorgement fee \Rightarrow 1032
 3,700 - 3,642.28

EXHIBIT '2'

Select recipient	Choose email or phone	Enter amount	Review & send	Money sent
---------------------	--------------------------	-----------------	------------------	---------------

Money sent

Confirmation USBDv5P4FWMO

Print 



Suzie
suzie_csr@yahoo.com

Amount

\$640.00

From: Business Checking ...1894

Frequency: One time, today

Sent on: 01/21/2021

Message: Court Transcript for Vasquez case

The money will be available in Suzie's account typically in minutes

STATE OF ILLINOIS, CIRCUIT COURT COUNTY	ANSWER/RESPONSE TO COMPLAINT/PETITION	<i>For Court Use Only</i>
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person or company that filed this case as Plaintiff/Petitioner. Enter your name as the Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.	<div style="border-bottom: 1px solid black; margin-bottom: 10px;"> Plaintiff / Petitioner (First, middle, last name or Company) </div> <div style="text-align: center; margin-bottom: 10px;"> v. </div> <div style="border-bottom: 1px solid black;"> Defendant / Respondent (First, middle, last name) </div>	<div style="border-top: 1px solid black; border-bottom: 1px solid black; height: 20px; margin-top: 10px;"> Case Number </div>

In 1, enter your full name.

In 2, enter the number and letter of each paragraph and subparagraph in the Complaint/Petition.

- Check "Admit" if you agree all of the statements in the paragraph are true; or
- Check "Deny" if you disagree with any of the statements in the paragraph; or
- Check "Do Not Know" if you do not know if all of the statements in the paragraph are true or false. This means you do not have enough information to truthfully admit or deny the statements.

If you run out of space, list additional paragraphs on an *Additional Paragraphs for Answer/Response to Complaint/Petition* form, check the box, and file it with this form.

735 ILCS 5/2-605(a) requires that if the Complaint/Petition is verified by oath that the *Answer/Response to Complaint/Petition* must also be verified.

1. My name is: _____
First
Middle
Last

and I am the Defendant/Respondent.

2. My Answer/Response to Complaint/Petition is:

Paragraph Number	Subparagraph Letter (if applicable)			
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know
_____	_____	<input type="checkbox"/> Admit	<input type="checkbox"/> Deny	<input type="checkbox"/> Do Not Know

☐ I have listed additional statements on the *Additional Paragraphs for Answer/Response to Complaint/Petition* form.

If the Complaint/Petition is verified by oath, then I certify that my answers above are true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

Enter the Case Number given by the Circuit Clerk: _____

735 ILCS 5/2-610(b) requires that you swear to a lack of knowledge if you cannot admit or deny any of the statements in the Complaint/Petition.

IL Supreme Court Rule 137 requires the Answer/Response to Complaint/Petition be signed.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Where I answer "Do Not Know" to paragraphs in section 2, above, I certify that I do not have enough information to admit or deny the statements in these paragraphs. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/

Your Signature

Street Address

Your Name

City, State, ZIP

Telephone

GETTING COURT DOCUMENTS BY EMAIL: If you agree to receive court documents by email, check the box below and enter your email address. You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information or notice of court dates. Other parties may still send you court documents by mail.

☐ I agree to receive court documents at this email address during my entire case.

Email

PROOF OF DELIVERY

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

CAUTION: If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.

1. I sent this document:

a. To:

Name:

First

Middle

Last

Address:

Street, Apt #

City

State

ZIP

Email address:

b. By: ☐ Personal hand delivery

☐ Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox

☐ Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

☐ The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)

☐ Email (not through an EFM or EFSP)

☐ Mail from a prison or jail at:

Name of prison or jail

Enter the Case Number given by the Circuit Clerk: _____

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

c. On: _____
Date
At: _____ ☐ a.m. ☐ p.m.
Time

2. I sent this document:

a. To:
Name: _____
First Middle Last
Address: _____
Street, Apt # City State ZIP
Email address: _____

- b. By: ☐ Personal hand delivery
☐ Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox

- ☐ Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

- ☐ The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
☐ Email (not through an EFM or EFSP)
☐ Mail from a prison or jail at:

Name of prison or jail

c. On: _____
Date
At: _____ ☐ a.m. ☐ p.m.
Time

3. I sent this document:

a. To:
Name: _____
First Middle Last
Address: _____
Street, Apt # City State ZIP
Email address: _____

- b. By: ☐ Personal hand delivery
☐ Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox

- ☐ Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

- ☐ The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
☐ Email (not through an EFM or EFSP)
☐ Mail from a prison or jail at:

Name of prison or jail

In 3, if you sent the document to more than 2 parties or lawyers, fill in a, b, and c. Otherwise leave 3 blank.

Enter the Case Number given by the Circuit Clerk.

If you sent your document to more than 3 parties or lawyers, check the box and file the *Additional Proof of Delivery* with this form.

c. On: _____
 Date
 At: _____ ☐ a.m. ☐ p.m.
 Time

☐ I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

I certify that everything in the Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/

Your Signature

Street Address

Print Your Name

City, State, ZIP

Telephone

4/16/2021 8:48 AM

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOISERIN CARTWRIGHT WEINSTEIN
Clerk of the Circuit Court
Lake County, Illinois

Gil C. Valdecanas

vs.

Shawn Obrian Taylor

21L 00000291

Gen No.

CERTIFICATE OF ATTORNEY – CIVIL DIVISION

1) Pursuant to Local Rule 2-2.01(c), I hereby certify that:

☒ There has been no previous Voluntary or Involuntary Dismissal of the subject matter of this litigation.☒ There is no other litigation presently pending in the county involving these parties.☐ There has been a previous Voluntary or Involuntary Dismissal of the subject matter of this litigation and at the time of dismissal that Case No. _____ was assigned to the☐ There is other litigation presently pending in the county involving the parties to or subject matter to this lawsuit and that case(s) is/are assigned Case No.(s) _____

Honorable _____

which is/are assigned to the

Honorable _____

2) Are you seeking any injunctive relief?

☐ Yes - Select the appropriate case subtype under the Chancery-CH heading below.☒ No - Select the appropriate non-Chancery case subtype below.

This data is being gathered for administrative purposes and will not be used for any other purpose.

Arbitration – AR

- ☐
- Arbitration/Tort
-
- ☐
- Arbitration/Contract
-
- ☐
- Foreign Judgment
-
- ☐
- Other subtype _____

Law Magistrate – LM

- ☐
- Eviction
-
- ☐
- Eviction as result of mortgage foreclosure
-
- ☐
- Replevin
-
- ☐
- Detinue
-
- ☐
- Distress for Rent
-
- ☐
- Foreign Judgment
-
- ☐
- Confirm Arbitrator's Award
-
- ☐
- Confession of Judgment
-
- ☐
- Other subtype _____

Miscellaneous Remedy – MR

- ☐
- Declaratory Judgment
-
- ☐
- Corporation Dissolution
-
- ☐
- Election Contest
-
- ☐
- Mandamus
-
- ☐
- Habeas Corpus
-
- ☐
- Review of Administrative Proceeding/Statutory
-
- ☐
- Review of Administrative Proceeding/Certiorari
-
- ☐
- Quo Warranto
-
- ☐
- Change of Name
-
- ☐
- Forfeiture
-
- ☐
- Fugitive from Justice
-
- ☐
- Search Warrant
-
- ☐
- Application for Eavesdropping Device
-
- ☐
- Foreign Judgment
-
- ☐
- Non-Attendance of Jurors
-
- ☐
- Miscellaneous
-
- ☐
- Other subtype _____

Probate – P

- ☐
- Decedent/Testate > \$15,000
-
- ☐
- Decedent/Intestate > \$15,000
-
- ☐
- Decedent/Testate \$15,000 or less
-
- ☐
- Decedent/Intestate \$15,000 or less
-
- ☐
- Guardianship of Person/Disabled Person
-
- ☐
- Guardianship of Estate/Disabled Person
-
- ☐
- Guardianship of a Person and Estate/Disabled Person
-
- ☐
- Guardianship of Person/Minor
-
- ☐
- Guardianship of Estate/Minor
-
- ☐
- Guardianship of Person and Estate/Minor
-
- ☐
- Proof of Heirship Alone
-
- ☐
- Foreign Judgment
-
- ☐
- Other subtype _____

Chancery – CH

- ☐
- Residential Mortgage Foreclosure
-
- ☐
- Residential Mortgage Foreclosure w/Mechanics Lien
-
- ☐
- Non-Residential Mortgage Foreclosure
-
- ☐
- Injunction
-
- ☐
- Specific Performance
-
- ☐
- Mechanics Lien Foreclosure
-
- ☐
- Complaint for Rescission
-
- ☐
- Partition
-
- ☐
- Quiet Title
-
- ☐
- Class Action
-
- ☐
- Structured Settlement
-
- ☐
- Foreign Judgment
-
- ☐
- Other subtype _____

Law – L

- ☒
- Tort
-
- ☐
- Contract
-
- ☐
- Product Liability
-
- ☐
- Medical Malpractice
-
- ☐
- Legal Malpractice
-
- ☐
- Forcible Entry and Detainer
-
- ☐
- Replevin
-
- ☐
- Accounting Malpractice
-
- ☐
- Foreign Judgment
-
- ☐
- Confirm Arbitrator's Award
-
- ☐
- Other subtype _____

Tax – TD

- ☐
- Deeds
-
- ☐
- Other subtype _____

Tax – TX

- ☐
- Objections
-
- ☐
- Disposition of Collections of Judgment of Settlement
-
- ☐
- Sale in Error
-
- ☐
- Other subtype _____

Eminent Domain – ED

- ☐
- Eminent Domain
-
- ☐
- Condemnation
-
- ☐
- Other subtype _____

Municipal Corporation – MC

- ☐
- Annexation
-
- ☐
- Disconnection
-
- ☐
- Other subtype _____

Print Name George W. SvobodaSignature /s/ George W. Svoboda☒ Attorney☐ Self-Represented Litigant

171-366 (Rev 7/18)

4/16/2021 8:48 AM

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT

LAKE COUNTY, ILLINOIS

ERIN CARTWRIGHT WEINSTEIN

Clerk of the Circuit Court

Lake County, Illinois

Gil C. Valdecanas

Plaintiff(s)

vs.

21L 00000291

Gen No: _____

Shawn Obrian Taylor

Defendant(s)

JURY DEMAND

The ☒ plaintiff(s) ☐ defendant(s) in the above entitled cause demand a jury for trial of said cause.Gil C. ValdecanasBy: *George W. Svoboda*

Their Attorney(s)/Pro Se

Prepared by:

Attorney's Name: George W. SvobodaAddress: 37063 N Kimberwick LaneCity: WadsworthState: ILPhone: (224) 360-0696Zip Code: 60083ARDC: 6220463Fax: (413) 556-3884E-mail address: george@georgesvobodalaw.com

FILED

4/16/2021 8:48 AM

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOISERIN CARTWRIGHT WEINSTEIN
Clerk of the Circuit Court
Lake County, IllinoisGil C. Valdecanas

Plaintiff(s)

vs.

21L 00000291

Shawn Obrian Taylor

Defendant(s)

Gen No: _____

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222 (B)

Pursuant to Supreme Court Rule 222 (B), counsel for the above-named plaintiff certifies that plaintiff seeks money damages in excess of Fifty Thousand and 00/100 Dollars (\$50,000).

By

/s/ George W. Svoboda

Attorneys for Plaintiff

Prepared by:

Name: George W. Svoboda Pro Se ☐Address: 37063 N Kimberwick LaneCity: Wadsworth State: ILPhone: (224) 360-0696 Zip Code: 60083ARDC #: 6220463Fax: (413) 556-3884E-mail address: george@georgesvobodlaw.com

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS**

Gli C. Valdecanas

Plaintiff(s)

vs.

Shawn Obrian Taylor

Defendant(s)

21L 00000291

Case No:

SUMMONS

To each defendant:

You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the Clerk of this Court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp> or talk with the Lake County Circuit Clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask the circuit clerk for more information or visit www.illinoislegalaid.org.

If you are unable to pay your court fees, you can apply for a fee waiver. for information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to www.illinoislegalaid.org. You can also ask the circuit clerk's office for a fee waiver application.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

**NOTICE
PURSUANT TO ICR - 2-2.14**

**THIS CASE IS HEREBY SET FOR AN INITIAL CASE MANAGEMENT CONFERENCE
IN COURTROOM _____ ON _____**

AT

A.M./P.M.

171-138 Rev 09/20

**FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR
AN ORDER OF DEFAULT BEING ENTERED.**

This summons may not be served later than 30 days after its date.



WITNESS 4/16/2021

Erin Cartwright Weinstein
ERIN CARTWRIGHT WEINSTEIN,
Clerk of Court

LB

Prepared by:

Name: George W. Svoboda Pro Se ☐

Address: 37063 N Kimberwick Lane

City: Wadsworth State: IL

Phone: (224) 360-0696 Zip Code: 60083

ARDC #: 6220463

Fax: (413) 556-3884

E-mail address: george@georgesvobodalaw.com

(If service by facsimile transmission will be accepted, the telephone number of the plaintiff or plaintiff's attorney's facsimile machine is additionally required.)

Date of Service _____, 2021 (to be inserted by officer on copy left with defendant or other person).

SHERIFF'S FEES

(Service and return	\$	_____
(Miles	\$	_____
(Total	\$	_____

Sheriff of _____ County

I certify that I served this summons on defendants as follows:

(a)-(Individual defendants – personal):

(The officer or other person making service, shall (a) identify as to sex, race and approximate age of the defendant with whom he left the summons, and (b) state the place where (whenever possible in terms of an exact street address) and the date and time of the day when the summons was left with the defendant).

(b)-(Individual defendants – abode):

By leaving a copy of the complaint at the usual place of each individual defendant with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the summons. (The officer or other person making service, shall (a) identify as to sex, race and approximate age of the person, other than the defendant, with whom he left the summons, and (b) state the place where (whenever possible in terms of an exact street address) and the date and time of day when the summons was left with such person).

and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his usual place of abode, as follows:

Name of defendant	Mailing Address	Date of mailing
_____	_____	_____
_____	_____	_____
_____	_____	_____

(c)-(Corporate defendants):

By leaving a copy and a copy of the complaint with the registered agent, officer or agent of each defendant corporation, as follows:

Defendant corporation	Registered agent, officer or agent	Date of Service
_____	_____	_____
_____	_____	_____
_____	_____	_____

(d)-(Other service):

Sheriff of _____ County
 By: _____
 (Deputy)

Exhibit B

CERTIFICATION

Pursuant to the provisions of 28 U.S.C. § 2679, as amended, and by virtue of the authority delegated to me by the Attorney General under 28 C.F.R. § 15.4 and through the United States Attorney for the Northern District of Illinois, I hereby certify that I have read the complaint in *Gil C. Valdenacas v. Shawn O. Taylor*, No. 21 L 291 (Circuit Court of Lake County, Ill.), and that on the basis of the information now available with respect to the incidents referred to therein, I certify that Shawn O. Taylor was acting within the scope of his employment as an employee of the United States at the time of the incidents out of which the claim arose.

s/ Thomas P. Walsh

THOMAS P. WALSH
Chief, Civil Division
Office of the United States Attorney
for the Northern District of Illinois

Date: May 18, 2021